



FILED

9-29-16
04:59 PM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning Energy
Efficiency Rolling Portfolios, Policies, Programs,
Evaluation, and Related Issues.

R.13-11-005
(Filed November 14, 2013)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) RESPONSE TO PACIFIC
GAS AND ELECTRIC COMPANY'S PETITION FOR MODIFICATION OF DECISION**

14-10-046

FADIA RAFEEDIE KHOURY
JANE LEE COLE

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3860
Facsimile: (626) 302-7740
E-mail: Jane.Lee.Cole@sce.com

Dated: **September 29, 2016**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking Concerning Energy
Efficiency Rolling Portfolios, Policies, Programs,
Evaluation, and Related Issues.

R.13-11-005
(Filed November 14, 2013)

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E) RESPONSE TO PACIFIC
GAS AND ELECTRIC COMPANY’S PETITION FOR MODIFICATION OF DECISION
14-10-046**

I.

INTRODUCTION AND SUMMARY

Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), Southern California Edison Company (“SCE”) respectfully submits this timely response to Pacific Gas and Electric Company’s (“PG&E’s”) Petition for Modification (“PFM”) of Decision (D.)14-10-046, filed on August 30, 2016. The PFM requests that D.14-10-046 be modified to allow investor-owned utilities (“IOUs”) to count savings associated with energy efficiency (“EE”) incentives paid to customers pursuant to Assembly Bill (“AB”) 719 towards the IOUs’ energy savings goals. The PFM also seeks authorization for PG&E to count the savings associated with lighting incentives provided under PG&E’s rate schedule implementing AB 719.

SCE supports PG&E’s petition and agrees that the Commission should modify D.14-10-046 to allow savings from IOU-owned streetlights to count towards the IOUs’ energy savings goals.

II.

THE COMMISSION SHOULD APPROVE PG&E’S PFM AND ALSO ALLOW SCE TO COUNT SAVINGS ASSOCIATED WITH LED STREETLIGHT MEASURES TOWARD SCE’S ENERGY SAVINGS GOALS

Consistent with PG&E’s request, SCE seeks modification of D.14-10-046 to authorize SCE to count, toward its energy savings goals, savings associated with incentives provided to customers related to LED streetlight measures. SCE’s local government customers who replace High Pressure Sodium (“HPS”) streetlights with more efficient Light Emitting Diode (“LED”) lights under SCE’s Tariff Schedule LS-1 will experience energy savings.

A. Background

AB 719 requires that investor-owned utilities (“IOUs”)¹ offer tariffs to allow local governments to fund EE improvements of utility-owned street lights. AB 719 also stated that EE improvements performed under AB 719 “shall be eligible for any rebate or incentives available through ratepayer-funded programs intended to increase energy efficiency.” On March 3, 2014, the *Assigned Commissioner’s Ruling Amending Scoping Memorandum, and Providing Guidance on Energy Savings Goals for Program Year 2015* (“ACR”) in R.13-11-005 ordered the IOUs to file by July 1, 2015 tariffs to comply with AB 719 and PU Code 384.5.²

On October 24, 2014, the Commission issued D.14-10-046, which also directed the IOUs to file the tariffs to implement AB 719.³ However, D.14-10-046 ruled that “IOU owned street lights are ineligible for EE incentives.”⁴ Furthermore, as noted in PG&E’s PFM, the Commission also stated in D.14-10-046 that the “IOU owned street-lighting potential has been

¹ IOUs are defined here as SCE, PG&E and San Diego Gas and Electric Company.

² See *Assigned Commissioner’s Ruling Amending Scoping Memorandum, and Providing Guidance on Energy Savings Goals for Program Year 2015 (ACR)*, R-13-11-005, dated March 3, 2014, p. 13.

³ See D.14-10-046, p. 20.

⁴ See D.14-10-046, p. 19.

removed from the goals, and savings from compliance with AB 719 should not be counted toward goals.”⁵

On June 30, 2015, SCE filed Advice Letter (“AL”) 3241-E to establish a new optional tariff provision for its LED Streetlight Program under SCE Tariff Schedule LS-1. This optional provision (Option E, Energy Efficiency – Light Emitting Diode Fixture Replacement), allows customers served under Schedule LS-1 to replace their existing streetlight fixtures with LED fixtures and make payments for the replacement over time (for a period commensurate with the average life expectancy of the LED fixtures) while realizing reduced kWh usage due to the fixture replacement.⁶ SCE’s AL 3241-E noted that “SCE anticipates including LED streetlight measures in its post-2015 Energy Efficiency rolling portfolio and proposing to make such incentives available to participating customers to offset some of the cost of the EE improvements.”⁷ On March 30, 2016, SCE submitted AL 3241-E-A to update the rates contained within Option E. AL 3241-E-A was approved by the director of the Energy Division on May 19, 2016, and became effective on June 1, 2016.⁸

B. New Circumstances Justifying the Petition for Modification

In D.15-10-028, the Commission adopted EE goals for 2016 and beyond based in part on the Navigant study, which included efficiency savings from IOU-owned streetlights.² These are newly added goals given that IOU-owned streetlights were specifically removed from the goals

⁵ See D.14-10-046, p. 20.

⁶ SCE filed Supplemental AL 3241-E-A to amend SCE’s proposed Energy Efficiency Premium Charge (“EEPC”) value to remove the rate component of the undepreciated book value from the EEP rate structure in anticipation of closing the High Pressure Sodium Vapor (“HPSV”) streetlight fixture option to the new LS-1 customer installations in the near future.

⁷ AL 3241-E, p. 4.

⁸ Disposition Letter of Ed Randolph dated May 19, 2016.

² See D.15-10-028, at p. 7 “Today’s decision adopts goals for the IOU territories based on the Revised Navigant Study, with some additional changes.”; EE goals for 2016 and beyond were based on the Navigant Study attached to D.15-10-028 as Appendix 2 (“Navigant Study Energy Efficiency Potential and goals Study for 2015 and Beyond”) which includes goals IOU-owned street lights in section 3.4.2.4, Tables 3-7 and 3-8. See also, PG&E PFM at pp. 4-5 and Attachment to PG&E’s PFM.

in D.14-10-046.¹⁰ The Commission in D.15-10-028 did not, however, address or revisit the specific ruling in D.14-10-046 barring the IOUs from counting savings from complying with AB 719 towards IOUs' energy efficiency goals. As PG&E correctly explained in its PFM, the IOUs "should be able to count toward its energy efficiency goals the savings from measures that are now included in [their] goals, especially when measures entail the payment of the incentives."¹¹

C. Request for Relief

Because IOU-owned street lights are now included as part of EE goals for 2016 and beyond, SCE respectfully requests that the Commission modify D.14-10-046 to include savings from IOU-owned streetlights in its energy efficiency goals for 2016 and beyond. In addition, SCE agrees that IOUs providing incentives for converting HPSV to LED streetlight fixtures as intended under AB 719 should also receive credit for savings associated with those incentives toward the IOUs' EE goals.

Therefore, SCE requests that the Commission grant PG&E's PFM and modify D.14-10-046 as indicated in Section III.D.1 of the PFM. In addition, SCE requests that the Commission's decision granting PG&E's PFM be modified with language similar to the language provided in Section III.D.2 of PG&E's PFM to allow the IOUs to count savings associated with incentives provided under rate schedules implementing AB 719 toward their EE savings goals. To reflect broader relief based on this response to the PFM, SCE requests that the language in Section III.D.2 of PG&E's PFM¹² be further modified as follows:

PG&E The IOUs should count, toward ~~its~~ their energy savings goals, the savings associated with incentives provided ~~under PG&E electric rate schedule LS-1~~ for LED street lighting upgrades as of the effective date of each IOU's tariff implementing AB 719.

¹⁰ See D.15-10-028, Appendix 2, pp. 30 and 33. As noted in PG&E's request, the pages in the Navigant study are not numbered; PG&E's request includes the relevant pages in the attachment to their request.

¹¹ PG&E's PFM, p. 3.

¹² *Id* at p. 6.

III.

CONCLUSION

For all of the foregoing reasons, SCE respectfully requests that the Commission grant PG&E's PFM and modify D.14-10-046 as recommended above.

Respectfully submitted,

FADIA RAFEEDIE KHOURY
JANE LEE COLE

/s/ Jane Lee Cole

By: Jane Lee Cole

Attorneys for
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Telephone: (626) 302-3860
Facsimile: (626) 302-7740
E-mail: Jane.Lee.Cole@sce.com

Date: September 29, 2016